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12 *Attorneys for Plaintiff/Counterclaim Defendant*
Facebook, Inc.

19 FACEBOOK, INC., a Delaware corporation,
20 Plaintiff/Counterclaim
21 Defendant,
22 v.
23 BRANDTOTAL LTD., an Israel corporation, and
UNIMANIA, INC., a Delaware corporation,
24 Defendants/
25 Counterclaim
Plaintiffs.

Case No. 3:20-CV-07182-JCS

**DECLARATION OF MICHAEL
CHMELAR IN SUPPORT OF
ADMINISTRATIVE MOTION TO
SEAL JOINT LETTER BRIEF AND
ACCOMPANYING EXHIBIT F**

1 I, Michael Chmelar, declare as follows:

2 1. I am Associate General Counsel at Facebook.

3 2. The parties are filing a joint letter brief regarding BrandTotal's early discovery
4 requests.

5 3. Pursuant to Local Rule 79-5, I submit this Declaration in support of the Administrative
6 Motion to File Under Seal Confidential Information.

7 4. The redacted portion of the joint letter brief and the accompanying Exhibit F contain
8 confidential information about Facebook's reports to the Federal Trade Commission under a consent
9 decree with the Federal Trade Commission. Facebook submits its reports to the Federal Trade
10 Commission confidentially. Accordingly, Facebook requests that the Court allow the joint letter brief
11 and accompanying copy of the October Report to be filed under seal.

12
13 I declare under penalty of perjury that the foregoing is true and correct.

14 Executed on this 6 day of January 2021 in Redwood City, California.

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16 By: /s/ Michael Chmelar
17 MICHAEL CHMELAR
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